### UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b) **BROWN RUDNICK LLP** HAYNES AND BOONE, LLP Kenneth J. Aulet, Esq. (admitted *pro hac vice*) Richard S. Kanowitz, Esq. (NJ Bar No. 047911992) Seven Times Square Lauren M. Sisson, Esq. (NJ Bar No. 394182022) New York, New York 10036 30 Rockefeller Plaza, 26th Floor New York, New York 10112 (212) 209-4800 kaulet@brownrudnick.com (212) 659-7300 richard.kanowitz@haynesboone.com **BROWN RUDNICK LLP** lauren.sisson@haynesboone.com Tristan Axelrod, Esq. (admitted pro hac vice) One Financial Center Attorneys for the Plan Administrator Boston, MA 02111 (617)856-8300 taxelrod@brownrudnick.com General Counsel for the Plan Administrator GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 (973) 230-2095 DStolz@genovaburns.com DClarke@genovaburns.com Local Counsel for the Plan Administrator In re: Chapter 11 Case No. 22-19361 (MBK) BLOCKFI INC., et al., (Jointly Administered under a Confirmed Plan<sup>2</sup>) Hearing Date: March 27, 2024, 10:00 a.m. Debtors.<sup>1</sup> Response Deadline: March 20, 2024 Oral Argument Waived Unless Response Timely Filed

NOTICE OF THE WIND-DOWN DEBTORS' MOTION FOR AN ORDER (I) AUTHORIZING AND APPROVING THE SETTLEMENT AND RELEASE OF CLAIMS AND CAUSES OF ACTION BY AND AMONG THE WIND-DOWN DEBTORS AND FTX DEBTORS AND (II) GRANTING RELATED RELIEF

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The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

On October 3, 2023, the Court entered an order confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications) (the "Plan") [Docket No. 1609].

PLEASE TAKE NOTICE that a hearing on the Wind-Down Debtors' Motion for an Order (I) Authorizing and Approving the Settlement and Release of Claims and Causes of Action By and Among the Wind-Down Debtors and FTX Debtors and (II) Granting Related Relief (the "Motion") will be held on March 27, 2024 at 10:00 a.m. (ET), or as soon thereafter as counsel may be heard (the "Hearing") before the Honorable Michael B. Kaplan, Clarkson S. Fisher United States Courthouse, 402 East State Street, Second Floor, Courtroom 8, Trenton, NJ 08608.

**PLEASE TAKE FURTHER NOTICE** that the Motion and its attachments set forth the relevant factual bases upon which the relief requested should be granted. A proposed order granting the relief requested in the Motion is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection; (iii) conform with the Bankruptcy Court's *Order Granting Debtors' Motion to Establish Certain Notice, Case Management, and Administrative Procedures* [Docket No. 54], and (iv) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing Signing, and Verification of Documents dated March 27, 2002 (the "General Order") and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the "Supplemental Commentary") (the General Order, the Supplemental Commentary and the User's Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order and the

Supplemental Commentary, so as to be received no later than seven (7) days before the hearing date set forth above.

**PLEASE TAKE FURTHER NOTICE** that unless responses are timely filed and served, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

Dated: March 6, 2024

# /s/ Daniel M. Stolz

## **GENOVA BURNS LLC**

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